



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

Policy Updates Related to COVID-19: Current Sponsors of the Summer Food Service Program Meal Provision Guidance

(Updated **May 20, 2020**)

Applicable Meals Program: Summer Food Service Program (SFSP)

Background

As a part of the District of Columbia's response to coronavirus (COVID-19), the Office of the State Superintendent of Education (OSSE) is modifying, updating, and re-circulating certain policies.

Scope

This document contains details and policies specifically relating to the **provision of meals to children** by **current sponsors** of the Summer Food Service Program (SFSP).

Effective Date

This policy took effect May 20, 2020 and will remain in effect until further notice. This policy supersedes the OSSE policy on this topic released on April 27, 2020.

Policy Guidance

In the event of temporary or prolonged school closures, OSSE is committed to providing families several options to feed children. Summer Food Service Program (SFSP) sponsors are not required to feed children during closures caused by pandemics, building repairs, or natural disasters, but may do so following US Department of Agriculture (USDA) guidance, with the approval of OSSE, and in coordination with public health authorities.

USDA guidance allows SFSP sponsors approved to serve emergency meals to operate in times of pandemics, building repairs or natural disasters. OSSE received multiple USDA waivers that support social distancing in meal distribution, as articulated below.

Serving Option for SFSP Sponsors

With approval from OSSE, sponsors approved to participate in the SFSP in 2019 may serve and be reimbursed for meals during unanticipated school closures.

Sponsors interested in participating in this program:

- must apply and receive approval from OSSE;
- can be reimbursed for up to two meals per child each day;
- may distribute up to seven days of meals at once;

- must provide meals free of cost; and
- may provide meals to participants 18 and younger.

Questions and Answers

Q1. Are SFSP sponsors required to serve meals if schools are closed?

A. The USDA and OSSE encourage SFSP sponsors to serve meals to help ensure that children do not experience a lapse in food security when area schools and childcare facilities close. However, such meal service is not required.

Q2. Can SFSP sponsors serve meals if schools are closed?

A. Yes. SFSP sponsors may serve and be reimbursed for meals during unanticipated school closures.

[New] This waiver is in effect through June 30, 2020.

Q3. How does an SFSP sponsor apply to OSSE to be able to serve meals during temporary or prolonged school closures? How does an SFSP elect to implement waiver options?

A. SFSP sponsors wishing to serve meals during this period of school closures must complete the SFSP 2020 expedited emergency meals application in Orchard. See the [SFSP Quick Reference Guide](#) for instructions.

If sponsors approved for meal service during this period wish to implement waiver options, they must complete the [COVID-19 Related Waiver Registration](#). To receive the instructions and waiver registration, contact SFSP Coordinator Shaneka King at Shaneka.King1@dc.gov.

Q4. Do SFSP sponsors need to update their applications to continue operations into the summer months?

- A. Yes. For summer 2020, the DC SFSP application deadline is May 30, 2020 for returning SFSP sponsors. New SFSP sponsors must submit their applications no later than July 1, 2020.

SFSP sponsors may operate under current unanticipated school closure requirements until June 30, 2020. OSSE will inform sponsors of any further USDA extensions to program operations waivers.

Q5. Where can meals be served?

A. Meals can be served at:

- School sites,
- Churches,
- Community centers,
- Afterschool centers,
- Closed enrolled sites,
- Any non-school site or school that was previously approved in 2019 or 2018.

Q6. Can approved sponsors apply for sites that were not approved in the 2019 SFSP?

A. Yes. The sponsor must complete the full site application for any new site and receive approval from OSSE.

Q7. Are sponsors required to complete first-week site visits for returning sites?

A. If returning sites are in good standing, sponsors are not required to complete first-week site visits. This also applies for sponsors and sites in good standing that had successfully participated in the Child and Adult Care Feeding Program (CACFP) or National School Lunch Program (NSLP). Sponsors must complete first week site visits for returning sites that are not in good standing. The USDA waiver eliminating this requirement for returning sites in good standing is in effect through Sept. 30, 2020.

Q8. Do sponsors have alternatives in regard to how they complete the first four week site visits?

A. Yes. Sponsors may use alternatives to in-person reviews. Sponsors may conduct offsite desk audits to complete these visits by receiving photos, digital versions of documents and holding phone meetings. Sponsors are also allowed to postpone these visits and hold them during the summer months for sites that will operate the traditional summer meals program.

Q9. How should sponsors determine closed enrolled sites' eligibility for SFSP?

A. Sponsors may use area eligibility to determine if closed enrolled sites are eligible to participate in SFSP. The waiver eliminates the requirement that closed enrolled sites collect income eligibility forms and is in effect through Sept. 30, 2020.

Q10. To whom can meals be served?

A. Children age 18 and younger.

Q11. What meals can be served?

A. SFSP sponsors can serve up to two meals or one meal and one snack per day, including breakfast, lunch, supper and an AM or PM snack. However, lunch and supper is not an allowable combination. Any additional meals will be not reimbursed by USDA.

Q12. Can more than one day's worth of meals be distributed at a time?

A. Yes. While this policy guidance is in effect through Aug. 31, 2020, sponsors that can distribute up to seven days' worth of meals at a time are approved to do so. Meals must be accounted for consistent with SFSP counting and claiming guidance.

Q13. Can meals be served on the weekends and receive USDA reimbursement?

A: Yes. When schools are closed for an unanticipated school closure due to COVID-19, with OSSE approval, SFSP sponsors may serve meals on days when schools had originally planned to be closed, including weekends, spring break, and other previously scheduled days off.

Q14. If a sponsor plans on giving out seven days' worth of meals at a time or providing home delivery, what are some recommended food safety practices?

A: Sponsors should use the Centers for Disease Control and Prevention (CDC) guidance for storing leftovers when planning their menu. Menus should ensure that the food will last for seven days or be replaced with a shelf-stable item. More information for crediting shelf-stable meat, poultry and seafood products can be found in this USDA policy memo. Sponsors should provide families with the menu for the week and guidance on cold food handling, and holding and reheating, to ensure all students are following proper food safety procedures. Sponsors must inform families on how long each menu item can remain in the refrigerator and continue to be safe for consumption. Meals that are not consumed before the last day they can be safely stored in the refrigerator should be discarded.

Q15. Do children need to be present to receive a meal served through SFSP?

A: No. Meals may be distributed to a parent or guardian to take home to their children. SFSP sponsors must have a plan in place to ensure accurate accountability and program integrity. Plans must include the following:

- A process to ensure that meals are distributed only to parents or guardians of **children age 18 and younger as well as persons age 18 and older with disabilities as defined in the regulations;** and
- A process to ensure that duplicate meals are not distributed to any child.

SFSP sponsors must elect to implement this option by completing the COVID-19 Related Waiver Registration. **[New] This waiver is in effect through Aug. 31, 2020.**

Q16. Are facilities required to adhere to traditional SFSP restrictions that limit how long a meal service can last and how much time must lapse between different meals?

A: No. Facilities can establish meal times and service lengths that best support non-congregate meal service in a manner that maintains health and safety standards. The waiver is in effect through Sept. 30, 2020.

Q17. Are facilities required to serve meals at pre-approved meal times?

A: Yes. Facilities must identify the exact times of the start and end of the meal service period on the program application. Additionally, sponsors' applications must identify the estimated number and types of meals to be served.

Q18. How should meal count records be maintained for reimbursement?

A: The standard meal count reporting procedures apply. Meal count records should be labeled as meals served under this policy guidance. To receive reimbursement, total meals must be reported to the state agency using the SFSP claim for reimbursement form.

Q19. Do meals have to meet the meal pattern standards for required components and minimum serving sizes?

A: OSSE strongly encourages and expects sponsors to maintain and meet the nutrition standards for each program to the greatest extent possible. OSSE recognizes that there may be specific and justified reasons the meal pattern cannot be met based on disruptions to the availability of food products resulting from unprecedented impacts of COVID-19 and may waive the requirement that meals meet meal pattern requirements.

Facilities can elect to implement this waiver option by completing the COVID-19 Related Waiver Registration. To receive the waiver registration, contact SFSP Coordinator Shaneka King at Shaneka.King1@dc.gov. **[New] Approvals to waive meal pattern requirements remain in effect through June 30, 2020.**

Q20. Will meal pattern waivers affect a program operator's responsibility to make meal modifications for participants with disabilities?

A: During this public health emergency, program operators are not relieved of their obligation to provide meal modifications for participants with disabilities. When planning a non-congregate meal service, program operators should consider how individuals who require meal modifications will be identified and served.

Q21. What can I do to provide meals that meet the meal pattern and are shelf-stable?

A: Detailed information on shelf-stable foods, those that can be stored at room temperature for an extended period of time, can be found [here](#). Shelf-stable milk may be used as needed. Other shelf-stable items include, but are not limited to, applesauce, sun butter, crackers, granola, dried meats and fruits, and juice. More information for crediting shelf-stable meat, poultry, and seafood products can be found in the USDA policy memo [SP 21-2019 Crediting Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Products in the Child Nutrition Programs](#).

Q22. Can schools that have been approved for non-congregate feeding through SFSP or Seamless Summer Option (SSO) deliver meals directly to students' homes?

A: Yes. If the School Food Authority (SFA) determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with OSSE approval. SFAs desiring to deliver meals to students' homes must update their SFSP or SSO application to reflect this new distribution method and contact their [OSSE nutrition program specialist](#) for approval. See OSSE's [Questions and Answers Related to COVID-19: LEA Meal Provision](#) dated April 20, 2020 and [USDA's Q&A](#) released on March 17, 2020 for requirements surrounding the delivery of meals.

Q23. Can SFSP sponsors other than School Food Authorities (SFAs) deliver meals to students' homes?

A: No. This option is only available to SFA sponsors of school sites due to student confidentiality and logistical requirements.

Q24. Does the child need to be present for home meal delivery?

A: No. As long as the school has obtained the household's written consent to deliver meals and has verified the current address, the student does not need to be present at the time of delivery. If the meals are shelf-stable, no one needs to be present, as long as the address has been verified. Please consider food safety requirements and best practices.

Q25. If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household?

A: Yes. To the extent feasible, SFAs or schools are encouraged to coordinate their deliveries to make the best use of their resources.

Q26. May SFSP operators provide food items in bulk, either through pick up or home delivery?

A: Program operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal. Only SFAs may implement home delivery as a distribution method. See question 18 (Q18) for more details on home delivery.

When implementing such a delivery mechanism, Program operators **must** consider the following:

- include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- ensure that food items are clearly identifiable as making up reimbursable meals; and,
- provide menus with directions indicating which items are to be used for each meal and the portion sizes.

When implementing such a delivery mechanism, Program operators **should** consider the following:

- whether households have access to needed appliances (e.g., refrigerator, stove, microwave) when providing food that requires refrigeration or further preparation, such as reheating; and,
- only minimal preparation is required (e.g., recipes that do not require chopping, mixing, baking).

Facilities can elect to implement this waiver option by completing the [COVID-19 Related Waiver Registration](#). To receive the waiver registration, contact SFSP Coordinator Shaneka King at Shaneka.King1@dc.gov.

Q27. Are there additional food safety measures that should be followed?

A: Yes. All food regardless of delivery or service method should follow proper handling, storing, and heating procedures. Cold food should be delivered below 40 degrees and hot food above 140 degrees. If the item is shelf-stable, it can be delivered at room temperature. See below for additional information regarding food safety.

Q 28. What health-related considerations should be taken into consideration?

A. Sponsors should review the guidance provided by USDA, the Centers for Disease Control and Prevention (CDC), and DC Health on proper sanitation and cleaning protocols in response to the COVID-19 virus. To limit additional exposure in the event of a large scale closure, meal service sites should create a plan to provide meals quickly to children through a grab-and-go style service method and discourage children from congregating at these locations. Share tables are discouraged at this time.

For more information, please visit <https://www.fns.usda.gov/disaster/pandemic>.

Q 29. Do you need to have “And Justice for All” (AJFA) posters on mobile routes for COVID-19 meal distribution?

A: For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed. The AJFA poster must be prominently displayed in all facilities and locations that distribute program benefits or administer services. Due to COVID-19, if printed 2019 AJFA posters are not available for display, [paper copies](#) may be substituted as necessary, including the use of the 2015 AJFA poster as needed. Meals delivered from stationary vans or buses should display the AJFA poster.

Q30: Where can I get information about other central food distribution locations?

A: Information about food distribution locations can be found at <https://coronavirus.dc.gov/food>. This resource will be updated regularly, so please check back frequently. Information can be found for each program as follows:

- **[New] Pandemic EBT (P-EBT)**
- Meal Delivery for Seniors
- Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF)
- Women, Infants, and Children

USDA has issued a number of guidance documents recently that extend the waivers for a number of Child Nutrition Programs. The table below identifies the date that select subjects of Child Nutrition Programs are in effect until.

Table 1. Dates Waivers Are In Effect Until for USDA Child Nutrition Program for Select Subjects

USDA Programs	Waiver Subject	Waiver in Effect Until
Child and Adult Care Food Program (CACFP)	Non-congregate feeding	August 31, 2020

	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020
	Meal Times	August 31, 2020
	Monitoring	June 30, 2020
Seamless Summer Option (SSO)	Non-congregate feeding	August 31, 2020
	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020
	Meal Times	September 30, 2020
Fresh Fruit and Vegetable Program (FFVP)	FFVP	June 30, 2020
	Parent Pick-up	June 30, 2020
Summer Food Service Program (SFSP)	Non-congregate feeding	August 31, 2020
	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020
	Meal Times	September 30, 2020
	Monitoring	June 30, 2020
	Closed Enrolled	September 30, 2020
	First Week Site Visit	September 30, 2020

For resources and information about the District of Columbia Government's coronavirus (COVID-19) response and recovery efforts, please visit coronavirus.dc.gov.